California Regional Water Quality Control Board
North Coast Region
Beverly Wasson, Chairperson

Alan C. Lloyd, Ph.D.
Agency Secretary

http://www.waterboards.ca.gov/
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone: 1 (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Arnold Schwarzenegger
Governor

July 1, 2005

Ms. Julie B. Raming
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Dear Ms. Raming:

Subject: Interim Remedial Measures Workplan Comments

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg
Case No. 1NMC462

Regional Water Board staff have reviewed the following Acton Mickelson Environmental, Inc., submittals for the Georgia-Pacific Fort Bragg Sawmill site: *Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures* (Plan) dated March 21, 2005, and *Addendum #1, Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures* (Addendum) dated May 6, 2005. Regional Water Board staff have the following comments on the Plan and Addendum:

RECONNAISSANCE

- Regional Water Board staff will need to participate in the reconnaissance of building areas or the reconnaissance results should be fully reviewed on-site with Regional Water Board staff before the removal work begins. Please contact us at least one week prior to the reconnaissance to schedule it.

- It was stated in the workplan that a GPS system would be used to record the locations of potential COPC impacts during the reconnaissance. Since being able to return precisely to those locations after foundation removal is necessary, please be more specific on the precision and reproducibility of the GPS surveying to be used and if any additional surveying techniques will be used.

- In the reconnaissance of the building areas, areas observed to have signs of potential COPC impacts need to be photographically documented.

- After the reconnaissance is performed, a brief plan containing the proposed sampling locations must be submitted to this office. Staff realize field judgments will have to be made for additional sampling of observed impacts or potential impacts encountered during foundation removal.

- A full report of the reconnaissance and sampling surveying, including coordinates and reference system, should be included in the final report.

FOUNDATION REMOVAL

- More detail is needed to describe how observations will be done during the foundation removal work to screen for impacts. For example, will a person experienced in screening for contamination be observing the foundation removal work at all times and will field screening equipment be used?

- During foundation removal, efforts are needed to minimize the disturbance to the underlying soils prior to characterization. What efforts will be made?

SAMPLING

- The workplan focuses sampling activities on generating data for risk assessment purposes. While collecting appropriate data for risk assessment use is needed, sampling activities need to also focus on finding and characterizing impacts. Where impacts are found, the extent of soil contamination will need to be determined.

- Sampling the soil at a depth of one foot was proposed, based on anticipated risk assessment needs. However, to screen for impacts, sampling the soil nearer to the surface may also be appropriate.

- The sample spacing and depth was proposed based on anticipated risk assessment needs. However, an evaluation of the sampling and analyses by your risk assessment consultants was not included with the workplan or addendum. Such an evaluation should be submitted to this office.

- Prior to excavation, soil needs to be sampled and analyzed to establish what contamination is present. It was not explicitly stated that sampling would be done before any soil removal was performed (e.g., of ostensibly contaminated soil).

- It was stated that verification samples would be analyzed only for the COPC's that had reported concentrations greater than the screening levels in the initial samples. Verification samples should be analyzed for all impacts found in the respective location.

- More detail needs to be given on what verification sampling will be performed (e.g., spacing) in areas where contaminated soil is excavated.

- How soon after soil is exposed will it be sampled?

BACKFILL

- It was proposed to backfill excavations with material that would potentially allow more infiltration of water into the surrounding soils than currently can with the foundations in place. Final cleanup concentrations for soil contaminants will not be formally established before the risk assessments and the final RAP are prepared and approved. In addition, contamination impacts may be found with this work that will not be fully delineated until a later time. Thus, the remaining soils need to be protected from additional water infiltration that could mobilize contamination.

- How will the imported fill material be verified as clean? Identify the actual source of soil to be used to backfill the excavation pits.

ANALYSES

- The reporting limits for the laboratory analyses will need to be at least no greater than the screening levels to be developed as part of the risk assessment process.

- Analytical detections between the method detection limit and the reporting limit should be noted.

- The reports of the 1989 transformer spill near the hog indicated that that transformer was located on the inside of a building (that particular building does not appear to be part of this workplan's scope of work). Throughout the site, were other transformers located inside buildings? PCB analysis should be added for sampling areas where interior transformers or PCB-containing structures may have been located.

- The TPH analyses performed need to produce results useable for the risk assessment. It had been proposed in our meeting with OEHHA that the TPH Criteria Working Group method be used for the risk assessment. It does not appear that the proposed TPH analyses will provide the TPH breakdowns necessary for this method.

- The testing for jet fuel impacts should include analysis for lead.

- The testing for transformer cooling oil impacts should include analysis for TPH in addition to the proposed PCB analysis.

- The testing for paint impacts should include analysis for metals.

- Sampling at the former Sawmill #1 and lath plant should include analysis for potential pentachlorophenol/tetrachlorophenol impacts.

OTHER COMMENTS

- Soil cleanup levels will also need to address potential leaching of contaminants into water. This could be accomplished through contaminant leachability tests on soil samples.

- The Best Management Practices (BMPs) for the excavation work should include practices to prevent precipitation and runoff from entering open excavations.

- Any activities and BMPs to be used in this work that are not currently part of the Storm Water Pollution Prevention Plan for this site should be included in an addendum to the Storm Water Pollution Prevention Plan.

- There is little detail in the workplan on how the removal work in the Glass Beach areas will be performed. A plan needs to be submitted detailing the methods to be used, the extent of material to be removed or the criteria to be used to determine the extent to be removed, the procedures to be used to prevent losing control of material, and how these areas will be finished.

- There is some use of the beaches by the public in the area of this work. This needs to be addressed. Access to the work area needs to be restricted.

- Observations made during the work in the geophysical anomaly areas should be photographically documented.

- In future plans and reports, please do not include the San Francisco Bay Regional Water Quality Control Board (SF RWQCB) Environmental Screening Levels. The SF RWQCB is a separate regulatory agency that has oversight of a different geographical region than that of the North Coast Regional Water Quality Control Board. The SF RWQCB Environmental Screening Levels were drafted using general assumptions for the San Francisco Bay area and policies of the SF RWQCB that may not be appropriate for this site and are not necessarily used by the North Coast Regional Water Quality Control Board. The SF RWQCB Environmental Screening Levels were also developed using water quality objectives that may not be appropriate for this site.

- The only areas of the site for which we will consider no further action recommendations separate from the entire site are the areas that are part of the initial proposed public land acquisition.

A response to these comments will need to be submitted to this office for and approved by Regional Water Board staff before this work is implemented. If you have any questions or comments, you may contact me at chunt@waterboards.ca.gov or (707) 570-3767.

Sincerely,

/ORIGINAL SIGNED BY/

Craig Hunt
Water Resource Control Engineer

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cc: Acton Mickelson Environmental, Inc., 5175 Hillsdale Circle, Suite 100, El Dorado Hills, CA 95762

Ms. Kay M. Johnson, Tetra Tech, Inc., 3746 Mt. Diablo Boulevard, Suite 300, Lafayette, CA 94549

Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue, Fort Bragg, CA 95437

Ms. Linda Ruffing, Community Development Department, City of Fort Bragg, 416 N. Franklin Street, Fort Bragg, CA 95437

Mendocino County Environmental Health Department, 501 Low Gap Road, Room 1326, Ukiah, CA 95482

Ms. Moira McEnespy, California State Coastal Conservancy, 1330 Broadway, 11th Floor, Oakland, CA 94612-2530

Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA 95437

Mr. Andy Whiteman, City Manager, 416 N. Franklin Street, Fort Bragg, CA 95437

Ms. Loie Rosenkrantz, 17201 Franklin Road, Fort Bragg, CA 95437

Mr. David L. Berry, Department of Toxic Substances Control, P.O. Box 806, Sacramento, CA 95812

Ms. Ashle Crocker, Remy, Thomas, Moose, and Manley, 455 Capitol Mall, Suite 210, Sacramento, CA 95814